| 1  | FISHER & PHILLIPS LLP   |                                 |
|----|---|---------------------------------|
| 2  | DAVID B. DORNAK, ESQ.<br>Nevada Bar No. 6274  |                                 |
| _  | 300 South Fourth Street, Suite 300  |                                 |
| 3  | Las Vegas, NV 89101   |                                 |
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| 6  | Attorney For Defendant<br>Ameriprise Financial, Inc.                                    |                                 |
| 7  | -AND-   |                                 |
| 8  | DORSEY & WHITNEY LLP  |                                 |
| 9  | JILLIAN KORNBLATT, ESQ.   |                                 |
| 10 | Minnesota Bar No. 391232  |                                 |
| 10 | Pro Hac Vice Pending  |                                 |
| 11 | 50 South Sixth Street, Suite 1500   |                                 |
|    | Minneapolis, MN 55402   |                                 |
| 12 | Telephone: (612) 492-6156<br>Facsimile: (612) 340-2868                                  |                                 |
| 13 | Email: kornblatt.jillian@dorsey.com   |                                 |
| 13 | Attorney For Defendant  |                                 |
| 14 | Ameriprise Financial, Inc.  |                                 |
| 15 | UNITED STATES DISTRICT COURT  |                                 |
| 16 | DICTEDICTE OF NEWADA  |                                 |
| 17 | DISTRICT OF NEVADA  |                                 |
| 17 | MARISOL DE LA O, an Individual,   |                                 |
| 18 | The first of BE Err o, an martiaum,   | CASE NO.: 2:19-cv-00349-APG-VCF |
|    | Plaintiff,  | 01202 1 (01 <b>/ 2</b> 12)      |
| 19 | ,   |                                 |
| 20 | vs.   | STIPULATION AND ORDER FOR       |
| 20 |   | EXTENSION OF TIME FOR           |
| 21 | AMERIPRISE FINANCIAL INC., a  | <b>DEFENDANT TO MOVE,</b>       |
| 22 | Foreign Corporation, DOES I -X; and   | ANSWER, OR OTHERWISE            |
| 22 | ROE CORPORATIONS I -X.  | RESPOND TO PLAINTIFF'S          |
| 23 |   | <u>COMPLAINT</u>                |
| 24 | Defendant.  | (Second Request)                |
| -  |   |                                 |
| 25 | It is hereby stipulated by and between Plaintiff Marisol De La O and Defendan           |                                 |
| 26 | Ameriprise Financial, Inc. ("Ameriprise"), by and through their respective counsel, tha |                                 |
| 27 | the deadline for Ameriprise to move, answer, or otherwise respond to Plaintiff's        |                                 |
| 28 | Complaint shall be extended to Monday, June 3, 2019, and that any failure of            |                                 |
|    |   |                                 |

| 1  | Ameriprise to respond to the Complaint on or before that date shall not constitute a |  |
|----|--|--|
| 2  | waiver of any defenses or rights available to Ameriprise.                            |  |
| 3  | Dated: April 23, 2019  | FISHER PHILLIPS  |
| 4  |  |  |
| 5  |  | By: <u>/s/ David B. Dornak, Esq.</u> David B. Dornak (#6274)     |
| 6  |  | 300 S. Fourth Street   |
| 7  |  | Suite 1500<br>Las Vegas, Nevada 89101                            |
| 8  |  | Telephone: (702) 862-3612<br>Facsimile: (702)                    |
| 9  |  | Email: ddornak@fisherphillips.com                                |
| 10 |  | Attorneys for Defendant  |
| 11 |  | Ameriprise Financial, Inc.                                       |
| 12 | Dated: April 23, 2019  | DORSEY & WHITNEY LLP   |
| 13 |  | By: /s/ Jillian Kornblatt, Esq.                                  |
| 14 |  | Jillian Kornblatt (MN #391232)                                   |
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| 18 |  | Attorneys For Defendant  |
| 19 |  | Ameriprise Financial, Inc.                                       |
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| 1      | Dated: April 23, 2019 HKM EMPLOYMENT ATTORNEYS LLP                                     |
|--------|--|
| 2      |  |
| 3      | By: /s/ Marta Kurshumova  Jenny L. Foley (#9017)                                       |
| 4      | Marta D. Kurshumova (#14728)<br>1785 East Sahara, Suite 300<br>Las Vegas, Nevada 89104 |
| 5<br>6 | Telephone: (702) 625-3893<br>Facsimile: (702) 625-3895                                 |
|        | Email: jfoley@hkm.com Email: mkurshumova@hkm.com                                       |
| 7      | Email: mkursnumova@nkm.com   |
| 8      | Attorneys For Plaintiff Marisol De La O  |
| 9      |  |
| 10     |  |
| 11     | <u>ORDER</u>   |
| 12     | IT IS HEREBY ORDERED:  |
| 13     | That pursuant to the Stipulation agreed upon by both parties, the deadline for         |
| 14     | Defendant to move, answer or otherwise respond to Plaintiff's Complaint shall be       |
| 15     | extended to June 3, 2019.  |
| 16     | Dated: April 24, 2019  |
| 17     |  |
| 18     | Magistrate Judge Cam Ferenbach United States District Court                            |
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